

AM

May 15, 2004

Ms. Allison Ray Alaskan Way Viaduct project 999 Third Avenue – Suite 2424 Seattle WA 98104

SR-99 Viaduct and Seawall Replacement – Comments on Draft EIS

Dear Ms. Ray:

The Duwamish Planning Committee has been meeting with the Alaskan Way Viaduct Design Team for the past three years. We have evaluated the various proposals for reconstruction of the Viaduct and it's arterials. It has become increasingly apparent that all of the alternatives currently under consideration have significant negative impacts on transportation and freight mobility within the Duwamish Manufacturing and Industrial Center. The severity of these impacts are highly dependent on the preferred alternative that emerges from the final EIS and the design details of the finalized project. The only viable alternative delineated in the Draft EIS is a variation of the cut and cover tunnel. Our major areas of concern have been expressed to the design team during our meetings and are delineated below.

• The planning and design process for the SR-99 Viaduct demonstrates the lack of coordinated regional transportation planning in the Seattle area. The preliminary designs for this project were developed without referencing the Duwamish Manufacturing and Industrial Plan, or integrating it's transportation priorities. The design alternatives described in the Draft EIS fail to adequately address the interface of SR-99 with other major arterials and proposed transportation projects in the area. These include, but are not limited to, both phases of the SR-519 Project, the Spokane Street Viaduct Project and the connection to Interstate 5 via SR-509.

- This Alaskan Way Viaduct a vital freight corridor servicing industrial and warehousing operations in Seattle's two designated Manufacturing and Industrial Centers. The Duwamish and Ballard Interbay M and I Centers are home to more than 4500 businesses and 80,000 employees. The viability of these businesses depends on an efficient and functional transportation infrastructure. Boeing attempted to make this point for years before relocating its headquarters to Chicago. In a DPC survey of businesses that had moved out of the Duwamish, transportation congestion and impeded access were repeatedly cited as primary reasons. It is imperative that any Preferred Alternative preserve the existing capacity provided by SR-99. It is also important that the project be designed to enhance and not impede access to local businesses.
- The SR-99 Surface Street alternative, as described in the Draft EIS, is unacceptable. It
 would significantly reduce the through capacity of the corridor and exacerbate our
 regional transportation problems. It would also generate increased congestion on
 Interstate 5 and all local arterials.
- The Bypass Tunnel, as described in the Draft EIS, is unacceptable because it would sever
 the vital connection between the two designated M and I Centers, the Duwamish and
 Ballard InterBay (BINMIC). This would force an excessive amount of truck and
 commercial traffic onto, local streets and arterials, increasing delivery times and
 operational costs for industrial businesses.
- The elimination of access ramps in the area of the downtown office core will have a significant impact on the North Duwamish. Without these ramps and the access that they currently provide, increased commuter traffic will be channeled into the Duwamish M and I Center from Michigan Street, north. This will increase congestion on already crowded arterials, making access to local businesses more difficult and lengthening transit times for freight deliveries. The proposed design alternatives described in the Draft EIS seem to favor the Central Business District at the expense of industrial and manufacturing operations.
- The proposed addition of a Northbound off-ramp at or near Atlantic Street is another significant concern. After detailed review by our team of transportation consultants, this proposed ramp was removed from the approved project list in the Duwamish Manufacturing Industrial Center Plan. This ramp will dump an excessive amount of vehicular traffic onto the surface streets in an already congested area. Many of these vehicles will be seeking a direct link from Highway 99 to the I-5 and I-90 corridors. This ramp provides no significant benefits to industrial businesses or property owners, yet it will significantly impact freight mobility in the area.
- The impacts of this project on the properties and businesses located north of Holgate and west of First Avenue needs to be analyzed in detail. All of the proposed alternatives severely restrict access and egress to and from these businesses and make freight deliveries virtually impossible

- Any design option for the Viaduct must adequately address it's interface with both Phase One and Two of the SR-519 Project. Current proposals to redesign Phase Two of the SR-519 Project and eliminate the west bound offramp are unacceptable. The full couplet design for the SR-519 Project functioned efficiently because it distributed traffic evenly over a larger area, channeling access and distribution through a greater number of intersections. During our committee's work on the Duwamish M and I Center Plan, all of the analysis done by our transportation consultants showed that the full benefits of the SR-519 Project would not be realized until both phases were completed. Phase one alone has a greater negative impact on freight mobility and access to local businesses because it channels significant volumes of commuter traffic further south into the industrial zones, clogging arterials and degrading levels of service at key intersections. The intersection at First and Atlantic has become increasingly congested since the opening of Phase One of the SR-519 Project. The right-of-way on Atlantic Street is considerably narrower than that on Royal Brougham and can not be expected to handle the volumes of traffic that are being projected. Every traffic forecast that we have seen indicates that the service level of this intersection will continue to degrade as the area develops.
- The elimination of proposed improvements in the connections of the Viaduct to Spokane Street create additional impacts for Duwamish businesses, as well as freight mobility. The elimination of adequate Westbound access to the Spokane Street Viaduct will significantly increase congestion North of Spokane Street. The current configuration of the Spokane Street Viaduct project will force truck and delivery vehicles to travel North to Lander Street, West on Lander, and then South on First Avenue to access the Westbound lanes of the Viaduct. This circuitous route will add significantly to the levels of traffic between Spokane and Lander Streets. The current design for the Spokane street Viaduct is nine years old. It was developed before either of the sports stadiums were constructed and well before the SR-519 Project was designed. The design for Spokane Street is obsolete. It does not interface adequately with the SR-519 Project or the Viaduct alternatives as described in the EIS.
- Considering the potential commercial development in South Downtown, the section of the viaduct between Jackson and Holgate streets is critical. Since Safeco Field and the Seahawks Stadium and Exhibition Center opened, traffic congestion in this area has increased significantly. As the economy improves and development increases within the Stadium Transition Zone, these traffic problems will be exacerbated. The new I-C Zone surrounding Safeco Field provides the capacity for 3 million square feet of office and commercial development. To date, the SDOT traffic models have failed to take these land use actions into account. It is imperative that viaduct planners take future development in this area into consideration. This may require modifying the City traffic analysis software to evaluate the impact of significantly increased density on transportation in this area.

- The design of this project in the vicinity of SAFECO Field and Seahawks Stadium needs to be reexamined. The Port of Seattle is committed to the long term use of Terminal 46 as a container facility for Hanjin. This requires access to the north SIG yard as well as to I-5 and I-90 via SR-519. The design alternatives currently under consideration do not address the long term requirements of the Port, nor do they provide adequate access to businesses and properties in the vicinity of the project. The ideal solution to the complex issues in this area would seem to be an extension of the cut and cover tunnel south to Holgate Street. This option was investigated earlier in the design phase, but was rejected as too costly. We believe that the extension of a tunnel through this area has merit and should be reexamined. It solves the east west access issues and provides a much broader range of options for future development in the area. We need only look to Boston for a catalog of innovative transportation solutions. The Ted Williams Tunnel, the Charles River Bridge, tunnel jacking, advanced soil stabilization techniques and collaboration with Japanese and European engineering firms are setting standards for While Boston is developing a world-class transportation the next century. infrastructure, Seattle is mired in cost conscious political expediency. Effective long term solutions may be more expensive initially, but short-term fixes will cost considerably more over the long term.
- Budgeting for the mitigation of Viaduct construction impacts must adequately account for the length of construction and the severity of these impacts on local businesses. The City must also develop a comprehensive plan to address the alternative routing of freight and oversized vehicles during the construction period.

Any replacement for the viaduct must maintain or expand existing capacity and access, anything less will create additional transportation problems which will have to be faced in the future. It must also address the reconstruction of the crumbling sea wall which supports the viaduct itself. The only current alternative that addresses all of these issues is the cut and cover tunnel. It opens up Seattle's waterfront, simultaneously replaces the seawall and — most importantly — preserves capacity. The City and State have been exploring every option to reduce the costs of this project. We are concerned that these agencies are in such a rush to fund and initiate construction that they are willing to settle for an inadequate alternative which creates more problems than it solves.

David Huchthausen - Chair

Duwamish Planning Committee